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CV-20-28-TUC-JR

COMPLAINT

RECEIVED	LODGED COPY
JAN 16 2020	
CLERK U.S. DISTRICT COURT DISTRICT OF ARIZONA	
BY	DEPUTY

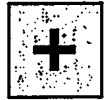
Of llessuR nala drahcir, EKUD, in presence for proffering,
then, securing Blessings and Luck of and for The People, as a
Spiritual Soul bound and unbound by all and no Law of Land,
Law of Sea; begot of William "Popsie" Russell, begot of Dwain
Franklin Russell and bore in, as, and of physical, natural,
form by the natural person titled Lauree Lee Russell on
January 21st, 1989, approximately 2 years after his full-blood
brother of natural person Alexander James Russell; of equal
blood rights and claim to and on the HOUSE OF LLESSUR; duly
answering ONLY by act of motion to, at, and on behalf of the
natural person "Richard Alan Russell" V.C. as recognized by
all citizens of the Plant Earth;

being answerable at physical mailing address 4071 E. Santa
Barbara Ave, Unit 1, Tucson AZ 85711, phone +1 520 213 9973,
preferred email rick.alan.russell@gmail.com; that is,

"Richard Alan Russell" V.C. as a natural person of flesh being
answered ONLY by his unlawfully lawful, Supremely empowered,
Spiritual Soul of, at, by llessuR nala drahcir, EKUD;--
understanding,

EKUD, llessuR nala drahcir, enacts Consul, of a *pro se* and *se*
pro nature, as a spatially higher-dimensional Spiritual Soul
not understanding Universal (i.e. Human-kind) Law (e.g. of
Time), of and for the natural person titled "Richard Alan
Russell" V.C., in and for all acts, starting within the
present, *forma pauperis*.

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JURISDICTION

1 Of Federal Personal and Federal Subject-matter, concerning
2 acts of Conspiracy, for preservation of a state of medicine
3 and state of being;
4 understanding Federal (Question) Jurisdiction, in an
5 applicable District Court, Supreme Court, or any
6 combination of a District and Supreme Court of law ruling
7 over the State of Arizona and over The UNITED STATES OF
8 AMERICA; In and For:

9 The People of the City of Tucson, County of Pima,
10 State of Arizona, and understanding, ANY and ALL
11 lawfully and duly empowered order(s) and judgement(s)
12 ONLY be an act in spirit of fact in letter and color,
13 which itself has been bestowed, empowered, and
14 ascribed within Article 3 of the UNITED STATES
15 CONSTITUTION.

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24

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PLAINTIFF

26

RICHARD ALAN RUSSELL V.C., with

27

Date of Birth January 21st, 1989, and of

28

Alias, "Mr. Russell", "Ricardo", "Rick", and

29

Represented by llessuR nala drahciR, EKUD, from, to, the

30

mail service address of 4071 E Santa Barbara Ave, Unit 1,

31

Tucson, AZ, 85711.

32

v.

33

DEFENDANTS

34

Conspirators: THE UNIVERSITY OF ARIZONA ("UARIZONA"),

35

COLLEGE OF MEDICINE - TUCSON ("COM"), THE ARIZONA BOARD OF

36

REGENTS, doctor KEVIN F MOYNAHAN, doctor TAYLOR RIALI,

37

doctor SEAN P ELLIOTT, and doctor RICHARD KUMET, all with

38

the permanent mail service address of 'Office of General

39

Counsel, University of Arizona, PO Box 210066, Tucson,

40

Arizona 85721-0066', some with physical location of

41

'Administration, Building, 1401 E. University Blvd., Room

42

103'.

43

Co-conspirators: Medical Doctors (i.e. doctors) within,

44

and acting as, legal and natural person(s) in compliant

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45 understanding of the Law of the County of Pima, Law of the
46 State of Arizona, and Law of the Federal Presidential
47 Constitutional Republic of THE UNITED STATES OF AMERICA.

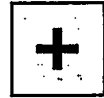
48 INTRODUCTION

49 Richard Alan Russell, and I have been wronged, and we have
50 no money, no experience, nor additional time lost to even
51 pursue this case. We are a happy and high-functioning
52 homosexual male born in the State of Arizona, and we are
53 passionate about sharing raw knowledge, humanism, and
54 financial sustainability originated from within creative
55 realm(s) of the Artz, of The Medicine(s).

56 NATURE OF ACTION

57 I, Richard Alan Russell V.C., had graduated from
58 undergraduate studies at the University of Arizona
59 (UARizona) having taken over 50 credit hours -- including
60 graduate level coursework in mathematics, philosophy,
61 econometrics, Business, etc. - over the course of two
62 semesters and a summer. I was exhausted, but it got me a
63 scholarship to the UARizona College of Medicine - Tucson
64 (CoM). The scholarship was 20k, which I invested over time
65 into building educational experiences for myself throughout
66 my approximate 6 years studying graduate medical doctor
67 coursework, hoping to earn an MD to help others, to serve
68 myself, and to delve into the field of science. I
69 originally requested a leave of absence (LoA), or

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70 deferment, before starting to make sure I truly wanted to
71 commit to over 150k in student loan debt at the UArizona
72 CoM, while I traveled several continents asking "what makes
73 a good doctor" under stewardship of a long lost benefactor.
74 However, I was notified that if I did not start immediately
75 that my scholarship funds would be revoked. So, I started
76 August of 2013. It is now January 0202; I was set to
77 graduate May 2020. I even had an interview for a primary
78 care family medicine residency program scheduled October
79 31st, 2019. What follows are the chronological events
80 leading to my administrative drop from the UArizona CoM,
81 days before I took and passed my United States Licensing
82 Examination (USMLE) Step 2 Clinical Knowledge, while in the
83 middle of my successfully applying to residency.

84 Upon starting medical school, I remember wanting to
85 understand how the world worked. I was extremely passionate
86 about Black Woman's rights. I even read and carried around
87 with me one of the most powerful feminist books ever
88 written - Women, Race, and Class by Angela Davis. My scores
89 were never high on tests, and this was never my end goal.
90 My worst nightmare had been multiple choice tests, and
91 that's essentially all medical school examination. So, I
92 had to modify my study methods, but finally found an
93 effective way to score somewhere between the 5th and 55th
94 percentile. (This considered, I was never a student at risk
95 of failing out due to baseline academic performance as

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measured objectively in written examination.) Many a time, throughout medical school, I've been able to jump from the 4th national percentile (after not taking a single practice question) to the 50th national percentile (for example, after reading a 170 page surgery clerkship exam review book); the raw percent of the 50's (after being flown out to NYC to watch the Big Fish musical) to the 80's (after studying hard in my room at home), for example, on my neurology block final. All I had to do is study a little more to pass the examinations...this is a public university after all...

Well I managed to get through the 1st year but wanted and needed a Leave of Absence (LoA) - remember too that my deferral was denied the year prior. I took my first LoA as a medical leave per administration's suggestion; there would be less questions asked in residency. I told the counselor at the university I wanted to better balance out my personal and professional life. Really, I wasn't happy with the book curriculum and unimpressed. And I had even started to find legitimate, peer-reviewed research articles, which foreshadowed the monster awaiting me during my 3rd clinical year: "Medical error-the third leading cause of death in the US" (see Hopkins-CDC-letter). Anyways, back I came to allopathic schooling from this LoA, having worked for a massage and wellness center and an integrative health clinic for about a year. These temporary

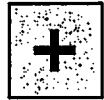
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122 and part-time jobs led me to the conclusion that people
123 prefer whatever type of medicine they prefer, regardless of
124 quite a few factors, and that money is an underlying
125 current in any healthcare setting. So, I passed second year
126 and passed my USMLE Step 1 (the first of 2 steps for
127 graduation with an MD and 3 steps for medical licensure).

128 I started my clinical rotations of 3rd year with zeal and
129 gusto! I thought I finally was going to learn about the
130 practice of clinical medicine. This did not go well; that
131 is learning the current state of clinical medicine. In
132 fact, it went so poorly, after my first clinical semester I
133 decided to take a personal leave out of the country. I had
134 designed what I assume is the first US MD program in
135 history that would allow students to graduate with a
136 foreign medical degree title and foreign second citizenship
137 by taking 1-1.5 years abroad in Peru understanding
138 international corporate law. The proposal was supported by
139 the previous president of the UArizona under a Designated
140 Campus Colleague, "DCC", contract. And so off I went to
141 live in Peru for 14 months. I met my Princess Salí; my
142 Peruvian cat that has provided me unending emotional and
143 mental support with her love. And before I knew it, after a
144 squabble with a diplomat and an unfortunately demented
145 grandmother who, despite being recorded by the Peruvian
146 police at their own initiation and will (for calling me a
147 woman and a pig like all the U.S. citizens), still helped

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me check my rough draft translations of two Memorandums of Understanding between the nations of India and Peru for integrating medicinal plants and traditional Indian medicine into the worldz allopathy.

Then, back to the UArizona CoM, under strict agreement to graduate in no more than 6.5 years total, or, my current graduation date of May 2020. I knew that even some bad, and all tribulation onward, will propel me to success of my biggest dreams and goals to help others helping myself. I started my studies back up, ultimately having to decide to expire my special migratory permission from the government of Peru, lose my chance to naturalize as a Peruvian citizen, and continue to pursue something not right at the UArizona CoM. I did my very best to not fail due to the graduation time constraint; I tried not to ask questions; I tried to model behaviors; I tried everything. But there was always a doctor (or two) that hated my guts. HesheehseH'd fail me no matter what I'd do.

I re-took my psychiatry clerkship and passed. (Keep in mind that at this point I had been reported by the director the psychiatry clerkship, a licensed psychiatrist along with the interim curricular affairs directors for "mentally unraveling", specifically and immediately after I attempted to collect - and did collect by act of fate, magic, love, hate, god, free will, or what's humanity - due evaluation forms from doctors I was assigned to work with by the

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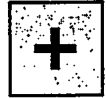


174 UArizona CoM and whom were happy to provide evaluations -,
175 and I had even one review written about me that I was
176 liable to permanently harm and kill patients from an
177 anonymous surgery clerkship grader.)
178 I retook my surgery clerkship, but was failed a second
179 time. I don't know why exactly I failed this second attempt
180 because the school first sent me passing grades. Then, they
181 said they collected more evaluations, but refused to send
182 me the corrected grades for well over the federal statute
183 time-limitation of 45-days upon request receipt, while
184 completely ignoring my ~5 emails for more information over
185 the time of a month during this last appeal. And now we are
186 at present time.

187 I have been told by the Medical Director's Director at
188 Canyon Ranch Inc, that due to what is obviously a "conflict
189 of interest" - as I am forced to litigate or carry more
190 than 250,000 USD in federal student loan debt with an
191 approximate 6.0% interest rate until I am 55 - that I must
192 discontinue my elective education with them despite
193 satisfactory performance.

194 Finally, I did receive access to my surgery grade(s) as
195 well as the rest of my FERPA protected educational records
196 both after 45 days of original receipt of request in
197 violation of federal statute, and I then discovered that the
198 faculty had been repeatedly concerned for their safety per

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their emailed communication because of my physical presence in legal acts of my natural person. I discovered that I was repeatedly called names of a clinical diagnostic nature without ever being given an duly enforceable medical examination, and that a picture of my face to identify me was circulated to warn other faculty - despite the Dean of Students marking me "no risk" to cause harm, despite the University of Arizona Police Department statement of "not criminal" in nature, and despite the Deputy Dean of Education filing a subsequent police report based my well worded and comprehensible email (to an assistant attorney general of the State of Arizona) within the University of Arizona Police department (UAPD) on November 1st, 2019. An employee even expressed concern for violation of federal laws at this time, and I was physically located over 4 hours away by car at my brother's house for the holidays with my nieces. This was all to his, doctor Kevin F Moynahan's sound (in other words unsound reality of) judgement and knowledge.

I, Richard Alan Russell, would like to settle out of court to pay off my loans due to the following, documented evidence-based claims:

CLAIMS

HARASSMENT - TITLE IX & FERPA VIOLATIONS

Claim 1

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224 Being called a "Dick" by a graduating senior over a
225 college-wide listserv with all students and faculty at the
226 UArizona CoM during my first weeks of school, with no end
227 intervention disallowing this behavior to continue by
228 administration and faculty year after year (written
229 documentation). Thus, the UArizona has advertised itself
230 fraudulently, deceiving students into thinking it provides
231 modern professional behavior training and exposure;

232 Claim 2

233 Having a resident physician give my cell phone number to a
234 patient without my permission and not in my presence
235 (written documentation); Having a physician send a group
236 text including other healthcare professionals about me
237 referring to a blow job (written documentation); Being told
238 I cannot send peer-reviewed article titles, abstracts, and
239 or findings relevant to the team's patient(s) via text
240 (personal testimony); Being dismissed to academic half-day
241 without explanation because I left the hospital building
242 during a fire (written documentation); Being told I have a
243 mental disorder when I tried to explain my personal
244 philosophy of dialetheism to an attending (personal
245 testimony); Later being explained to by the director of the
246 internal medicine clerkship that getting on the right
247 medicine for ADHD fixed all the problems for another
248 student like me (personal testimony); Being called late

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249 after work hours when I had the flu with the expectation
250 that I must pick up and discuss my "failures" for over an
251 hour, then being harassed in act of bullying by this same
252 doctor the next day during my lunch break for no patient-
253 related end (written documentation and personal testimony);

254 Claim 3

255 Having to repeatedly refuse to sign untrue and slanderous
256 and libelous statements against my professional character
257 and person then being penalized and retaliated for
258 exercising my right to and of refusal to sign (written
259 documentation); have physicians spread rumors about me
260 regarding false statements about my personal and
261 professional character repeatedly (written documentation
262 and personal testimony);

263 Claim 4

264 Being text late after work hours to answers of demands from
265 residents of me to discuss (for example) in detail my
266 communication about children's "stickers" and "cerebral
267 palsy" that Rick had had with patients - when in reality,
268 the next day the patient's mother had me step forward in
269 front of the entire care team to highlight this very same
270 interaction I had had by staying with her immobile daughter
271 later than anyone on the team (written documentation);
272 being excluded from seeing patients with the rest of the
273 team (personal testimony); being required to process

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274 medical records and not being recognized for my non-
275 educational work fixing broken doors and printers on the
276 unit when other hospital staff called for me on the phones
277 unknowingly as the manager of the entire hospital floor for
278 all this extra work to benefit the medical doctor
279 colleagues and teams (personal testimony and written
280 documentation);

281 Claim 5

282 Being accused of the crime of coercion because, while Rick
283 was alone in a closed room with 3 physicians refusing to
284 sign an evaluation falsely stating I had "questionable
285 honesty and integrity" and because according to the Dean of
286 Education, Rick shared my story in seeking support of
287 colleagues (written and phone recorded documentation);

288 Claim 6

289 Learning in an institute where there are not enough
290 patients to meet program training requirements; that is the
291 requirements as specified and as written by the UArizona
292 CoM for patient load (per student) necessary for training
293 and accountable performance evaluation, LCME documentation
294 and policy, and training of doctor skills (written
295 documentation);

296 Claim 7

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297 Retaliation for discussing and rightfully acting on my
298 frustration with the massive billing fraud that occurs
299 daily in the training hospitals (written documentation);
300 retaliation by the medical school medical doctors for
301 reporting unprofessional events in the workplace (written
302 documentation and personal testimony);

303 Claim 8

304 Verbal harassment by two faculty members (written
305 documentation); having the senior most attending surgeon
306 tell me we can't have perverts work in the hospital
307 (personal testimony);

308 Claim 9

309 Being told if Rick wants to pass that Rick can't ask
310 patient-related questions in public meetings that all
311 students attend, only ask in private, yet be praised for
312 one of these two same questions that Rick had asked during
313 the interdisciplinary healthcare team meetings (recorded
314 documentation);

315 Claim 10

316 Repeatedly being pulled away from my duties and clinical
317 study to address biased grades and biased appeals (written
318 documentation) and failures of the university to adhere to
319 their own written policy (written documentation);

320 Claim 11

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321 Not receiving adequate responses to emails and grade
322 documentation in accordance with federal public university
323 requirements outlined in FERPA and having my professional,
324 legal, acts of natural person shared with faculty not on a
325 need to know basis, violating my student rights (written
326 documentation); being graded (and also reported) unequally
327 when compared with other students with access to materials
328 in advance (written documentation); culminating in the
329 UArizona CoM committing fraud by failing to satisfy the
330 Liaison Committee on Medical Education (LCME) accreditation
331 requirements and both internal UArizona CoM (therein the
332 UArizona itself) policy requirement and federal government
333 public university requirement for accreditation;

334 Claim 12

335 Devaluing Rick with continual disrespect, false accusations
336 against my professional and personal nature, belittlement,
337 hate, dehumanization, liable, and unequal treatment to
338 extremes of gas-lighting over multiple years - disregarding
339 the value of my time and energy by failing me for drawing
340 attention to medical confusion, to team errors resulting in
341 possible harm and death to patients, and to degradation of
342 patient-centered care - which all ultimately left me
343 helpless in my attempts to uphold the Hippocratic Oath,
344 subsequently driving my stress level so high that I had
345 experienced insomnia and general sleep loss for months on

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346 end, IBS with literal explosive diarrheal episodes meeting
347 ADA requirements, abnormal heart palpitations for weeks,
348 and stroke-like events with sequelae. (written
349 documentation);

350 Claim 13

351 Having the licensed psychiatry clerkship director and the
352 (interim) dean of curricular affairs report me for mentally
353 "unraveling" to the Dean of Students ultimately because
354 Rick was trying to collect additional evaluation from my
355 "happily" willing program assigned, training physician(s)
356 (written documentation); (written documentation).

357 Subsequent to my academic dismissal, a group of medical
358 doctors then continued defaming my mental state to police
359 as "disjointed", "incoherent ramblings", even leading to
360 multiple interviews with independent health care experts
361 that all said the contrary, in accord with the Dean of
362 Students; - that I was sane, no risk to harm myself, and no
363 risk to harm anyone else. These mental health interviews
364 even required I meet with a Crisis Mobile team at my house
365 in the middle of the night. And both technicians agreed
366 that I was a sane and normal person. That the school had
367 wronged me, and that I should get a lawyer;

368 Claim 14

369 Being subjected to sexually charged conduct (disturbing the
370 peace) by a UArizona Foundation board member, repeatedly in

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371 his requesting for sexual advancement as separate from his
372 offer to invest in my companies (written and phone recorded
373 documentation); despite our understanding that we are only
374 focused on my company work;

375 Claim 15

376 Failure of the Office of General Counsel (as well as
377 multiple UArizona - CoM faculty) to investigate and respond
378 to my reports of 1st amendment violation and of Title IX
379 harassment violation to CoM (written and phone recorded
380 documentation);

381 Claim 16

382 Both the UArizona, CoM, committing a clear and repeated
383 pattern of abuse of discretion by neglecting to consider
384 valid and duly enforceable evidence, policy, and act(z)
385 (written documentation);

386 Claim 17

387 Defamation of character in form of both slander and liable
388 (police report with addendum[s]);

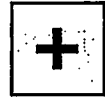
389 Claim 18

390 RICO Act violation of AZ state usury law (written
391 documentation, see AG's case);

392 CIVIL CONSPIRACY VIOLATION

393 Claim 19

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394 In multiple clinical settings physicians graded my
395 performance as trouble(d) with hierarchy, trouble(d) with
396 narcissistic damage, trouble(d) with taking feedback, and
397 trouble(d) with ability to learn (clinical) medical
398 knowledge, instead of recognizing Rick was and Rick is
399 simply trying to change the current healthcare setting by
400 being myself for the benefit of my own person and the
401 benefit of the patients. This is why my Facebook post
402 quoting the 2016 British Medical Journal words "the third
403 leading cause of death in the US" was reported to the
404 police by a Deputy Dean of Education at the Uarizona
405 College of Medicine;

406 These troubles inaccurately ascribed to my person were
407 communicated as fear-stricken fact between a minority of
408 different doctors, deans, residents, and faculty with
409 complete disregard to the legal and professional duties of
410 medical doctors (i.e. contractual and consensual physical
411 and history examination by a licensed medical doctor to do
412 no harm). And this is why Rick has many completely
413 contradictory evaluations, stating that Rick is an
414 excellent medical student to the contrary;

415 It appears that this trouble describing me was accepted as
416 true and never questioned in writing by this minority of
417 different doctors, all of which comprise the conspirators
418 and co-conspirators. For example, not one of conspiratorial

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419 medical doctors ever asked on record, "maybe we should see
420 if Rick is being harassed and we are breaking federal laws
421 like one of our non-MD employees was concerned about?") And
422 this minority of different doctors, deans, residents, and
423 faculty all agreed together that no objective voice
424 recordings, video recordings, nationally standardized
425 examinations, prepared academic medicine PowerPoint
426 presentation(s), additional evaluations from a diverse set
427 of licensed health care providers, peer-reviewed medical
428 journals, patient accounts, nor non-MD witness accounts be
429 used to establish fact;

430 This minority of different medical doctors were simply "the
431 doctors", and they decided together with unsupported fact,
432 based NOT upon sound and complete evidence, that Rick
433 should not graduate because of the "trouble(z)" they
434 clinically saw in my person, both professionally and
435 personally;

436 Rick, as in I, told the defendants that they were breaking
437 federal laws and they continued to break federal laws (e.g.
438 freedom of belief, 45 CFR 88, RIN 0945-AA10, document 2019-
439 09667 was clearly violated) for intents and processes of
440 expelling me. This conspiratorial and bullying activity,
441 and subsequent unlawful activity, literally put me into a
442 perceived and very real, perceived, state of duress, as

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443 recognized in writing and in free accord by both Plaintiff
444 and Defendant person(s).

445 DEMAND

446 For 7,000,000 USD cash;- that is SEVEN MILLION United
447 States Dollars cash, by
448 Demand for Jury Trial, for
449 Rick's personal and professional damages, which are both
450 repairable and irreparable in nature, understanding
451 applicable County, Division, State, Federal, and Supreme
452 lawful order(s) and judgement(s);- that is, by duly
453 empowered act understanding;- what is, as applicable within
454 and of the letter of tort, contract, or some combination of
455 tort and contract law(s), not to exclude restoration of and
456 for punitive and exemplary damages.

457 EXTRENAL (CASE) DOCUMENTS

458 1. Workplace bullying in NHS community trust: staff
459 questionnaire survey. Centre for Research in Health
460 Behaviour, Department of Psychology, University of Kent
461 at Canterbury, Canterbury CT2 7NP Lyn Quine, reader in
462 health psychology L.Quine@ukc.ac.ukBMJ 1999;318:228-32228
463 BMJ VOLUME 318 23 JANUARY 1999 www.bmj.com on 18 October
464 2019 by guest.

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- 465 2. Workplace bullying in junior doctors: Questionnaire
466 survey Article (PDF Available) in BMJ (online)
467 324(7342):878-9 · May 2002.

Editorial

**Mistreatment of Trainees:
Verbal Abuse and Other Bullying Behaviors**

*John H. Coverdale, M.D., M.Ed., FRANZCP
Richard Salom, M.D., Laura Weiss Roberts, M.D., M.A.*

- 468 3.
469 4. Virtual Mentor American Medical Association Journal of
470 Ethics March 2014, Volume 16, Number 3: 155-160.FROM THE
471 EDITOR To Bully and Be Bullied: Harassment and
472 Mistreatment in Medical Education.

Aggression among university employees

Kaj Björkqvist, Karin Österman, Monika Hjelt-Bäck

First published: 1994 |
[https://doi.org/10.1002/1098-2337\(1994\)20:3<173::AID-AB2480200304>3.0.CO;2-D](https://doi.org/10.1002/1098-2337(1994)20:3<173::AID-AB2480200304>3.0.CO;2-D)

- 473 5.
474 6. CARTER v. CURATORS OF THE UNIVERSITY OF MISSOURI Case No.
475 4:18-00426-CV-RK.
476 7. Carter v. Curators of the University of Missouri Missouri
477 Western District Court Judge: Roseann Ketchmark Case #:
478 4:18-cv-00426 Nature of Suit 190 Contract - Other
479 Contract Cause 18:1961 Racketeering (RICO) Act Case
480 Filed: Jun 01, 2018 Terminated: Mar 28, 2019.
481 8. Former Case Western Reserve University medical student
482 will likely lose degree for lack of "professionalism"
483 Updated Jan 11, 2019; Posted Mar 09, 2015.

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484 9. NOVA SOUTHEASTERN UNIVERSITY OF THE HEALTH SCIENCES,
485 INC., d/b/a College of Osteopathic Medicine,
486 Appellants/Cross-appellees, v. Keith M. SHARICK,
487 Appellee/Cross-appellant. Nos. 3D08-2507, 3D08-
488 2705. Decided: August 26, 2009.

489 10. UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
490 COLUMBIACYRENA CHANG PAULIN, Plaintiff, v. THE GEORGE
491 WASHINGTON UNIVERSITY SCHOOL OF MEDICINE AND HEALTH
492 SCIENCES Defendant. Civil Action No. 12-86 (GK).

493 11. UoA Handbook applicable to the time of events is not
494 available:

Rick Alan <rick.alan.russell@gmail.com>
to asya

Mon, Dec 9, 8:46 PM (11 days ago) ☆ ↵

so what are the handbook policies?

3 Attachments



RE: Medical Studies

Roberts, Asya D - (asya) via email@arizona.onmicrosoft.com
to me

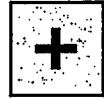
Tue, Dec 10, 9:48 AM (10 days ago) ☆ ↵

Yes, I sent another message yesterday asking the same thing. This is very unclear. I'll let you know what I receive back.
Thank you for your patience.
Asya

Asya Roberts
Executive Associate to the Vice Provost for Faculty Affairs

504 12. Keith M. SHARICK, Appellant, v. SOUTH EASTERN
505 UNIVERSITY OF THE HEALTH SCIENCES, INC., Dr. Michael Ham
506 - Ying, Dr. Matthew A. Terry, and Dr. Arnold Melnick, and

BEGIN: 12/12/2019 12:26:25 PM
MP 40:54:5 9102\61\21:DNE



507 Donald A.Tobkin, Appellees.District Court of Appeal of
508 Florida, Third District.November 10, 2004.Rehearing
509 Denied February 9, 2005.

510 13. No. 3D98-2674 District Court of Appeal of Florida,
511 Third District Sharickv. Southeastern University780 So.
512 2d 136 (Fla. Dist. Ct. App. 2000) Decided Aug 2, 2000.

513 14. WHAT CAN BE LEARNED FROM SHARICK V. SOUTHEASTERN
514 UNIVERSITY, Scott D. Makar Assistant General Counsel City
515 of Jacksonville, Florida

516 15. In the case of Morris v. Yale University, a medical
517 student sued Yale University for breach of contract
518 following his dismissal from school for his failure to
519 successfully complete a required examination. To succeed
520 in a breach of contract action, the medical student must
521 prove: (1) the formation of an agreement; (2) the medical
522 student performed as set forth in the agreement; and (3)
523 Yale breached the agreement and caused the medical
524 student damages as a result.

525 16. Yale Medical Student Claims Breach of Contract After
526 Failing Exam July 1, 2016If you have a question or
527 concern about special education law, school
528 administration, federal standards, or the overall rights
529 of a student, please feel free to call the expert
530 education law attorneys at Maya Murphy, P.C. in Westport
531 today at (203) 221-3100.

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Under FERPA, a school must provide an eligible student with an opportunity to inspect and review his or her education records within **45 days** following its receipt of a request. ... A case in point would be a situation in which the student does not live within commuting distance of the school. Jun 26, 2015

FERPA for Students - U.S. Department of Education
<https://www2.ed.gov/policy/gen/guid/fpco/ferpa/students>

532

17.

Title IX

TITLE IX ~ UA POLICIES ~ OPTIONS ~ TRAINING ~ PRINTED MATERIALS ~ ADDITIONAL RESOURCES ~ VAWA ~ QUICK EXIT ~

Title IX /

Title IX

Sexual Harassment and Violence

Title IX

Submit a Report

The Law

Definitions

Sex Discrimination

Sexual Harassment and Violence

Survivor Advocacy

Pregnancy

Athletics

FAQs

First Amendment

Press Releases

Title IX of the Education Amendments of 1972 ("Title IX"), 20 U.S.C. §1681 et seq., is a Federal civil rights law that prohibits discrimination on the basis of sex in education programs and activities. All public and private elementary and secondary schools, school districts, colleges, and universities (hereinafter "schools") receiving any Federal funds must comply with Title IX. Under Title IX, discrimination on the basis of sex can include sexual harassment or sexual violence, such as rape, sexual assault, sexual battery, and sexual coercion.

Below is additional information regarding the specific requirements of Title IX as they pertain to sexual harassment and sexual violence.

What are a school's responsibilities to address sexual harassment and sexual violence?

- A school has a responsibility to respond promptly and effectively. If a school knows or reasonably should know about sexual harassment or sexual violence that creates a hostile environment, the school must take immediate action to eliminate the sexual harassment or sexual violence, prevent its recurrence, and address its effects.
- Even if a student or his or her parent does not want to file a complaint or does not request that the school take any action on the student's behalf, if a school knows or reasonably should know about possible sexual harassment or sexual violence, it must promptly investigate to determine what occurred and then take appropriate steps to resolve the situation.
- A criminal investigation into allegations of sexual harassment or sexual violence does not relieve the school of its duty under Title IX to resolve complaints promptly and equitably.

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18.

534

19. [https://www.federalregister.gov/documents/2019/05/21/2](https://www.federalregister.gov/documents/2019/05/21/2019-09667/protecting-statutory-conscience-rights-in-health-care-delegations-of-authority)

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[019-09667/protecting-statutory-conscience-rights-in-](https://www.federalregister.gov/documents/2019/05/21/2019-09667/protecting-statutory-conscience-rights-in-health-care-delegations-of-authority)

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[health-care-delegations-of-authority](https://www.federalregister.gov/documents/2019/05/21/2019-09667/protecting-statutory-conscience-rights-in-health-care-delegations-of-authority)

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20. [https://www.azag.gov/sites/default/files/docs/press-](https://www.azag.gov/sites/default/files/docs/press-releases/2017/reports/ABOR-COMPLAINT-FINAL.pdf)

538

[releases/2017/reports/ABOR-COMPLAINT-FINAL.pdf"](https://www.azag.gov/sites/default/files/docs/press-releases/2017/reports/ABOR-COMPLAINT-FINAL.pdf)

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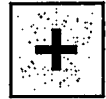
21. *Bevins v. Six Unknown Named Agents of Federal Bureau of*

540

Narcotics


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541 22. 42 USC. Section 1983 "deprivation of any rights,
542 privileges, or immunities secured by the Constitution and
543 [federal laws]

544


Jan 16th, 20 20
15: 15: 32